## CALIFORNIA CENTRAL VALLEY FLOOD CONTROL ASSOCIATION

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February 5, 1997

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## RECOMMENDATIONS TO THE GOVERNOR'S FLOOD EMERGENCY ACTION TEAM:

The California Central Valley Flood Control Association represents over seventy five reclamation, levee, drainage and flood control districts; private landowners; counties and one city between Red Bluff and Manteca who are responsible for maintenance of a substantial portion of the levee system of the Sacramento River Flood Control Project and the Delta. The Association has been active since 1926 in promoting the interests of those who work to maintain the safety of the flood control system.

Of immediate concern is the need to expedite levee repair and maintenance. The very nature of the levee system is to provide for safety of life and property. This protection extends to the habitat and wildlife it protects which should be recognized as mitigation. A secure flood protection system should not be compromised by the desire to enhance wildlife. We strongly believe it is necessary to remove unjustified and unreasonable constraints on levee maintenance and repair from environmental regulation. SAFETY FIRST not safety second, must be the motto!

For longer term consideration we submit the following four items as recommendations to the Action Team:

1. Insist that the federal flood control system of levees, bypasses and dams be evaluated and implemented as a whole system and not subjected to justification on an incremental basis.

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Currently the Corps of Engineers requires that each segment must be cost/benefit justified separately. This allows protection only for the urban areas and would ultimately jeopardize the integrity of the overall Project.

2. Consider the Delta Flood Protection Act of 1988 (SB 34) as amended by AB 360 (W. C. Chapter 601) as a pilot program which could be extended to the area within the Sacramento-San Joaquin Drainage District. This program provides financial assistance to local agencies for maintenance and improvement of levees in the Sacramento-San Joaquin Delta. The experience in the Delta during the recent January 1997 floods is a strong statement for the success of this program. The districts participating in the program, while experiencing some serious threats, survived with out flooding loss. Habitat improvements are an integral part of the program administered by the California Department of Water Resources.

One of the major advantages of the program has been the efficiency achieved in implementing needed improvements. By having the Department provide over sight and the projects administered by the local entities, a significant improvement in efficiency and reduction in cost was achieved. We believe this type of program on a system wide application could provide cost effective and rapid implementation of needed levee improvements. It provides a carrot, not a stick.

- 3. This Association supports the need for state and federal funding to implement levee system repair and maintenance. This could be accomplished through a temporary statewide sales tax increase, coordinated and integrated with federal appropriations to provide needed financing as was done for the earthquake. Cost sharing with local agencies for maintenance cost could be handled as it is in the Delta Levee Subvention Act referred to above.
- 4. Develop a method for the Corps of Engineers to pre qualify contractors and establish contract prices based on quantity for emergency repairs to avoid delays.
- 5. Improve communication between local levee maintenance districts who have unique knowledge of the area and Department of Water Resources and Corps of Engineers to save time, money and effort under flood fight conditions.

We will appreciate your consideration of the above recommendations. More detailed information on these matters will be provided at a later date.

Sincerely,

Robert D. Clark,

Manager

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